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March 7, 2024

Electronically filed

Honorable Zahid N. Quraishi **United States District Court** Clarkson S. Fisher Bldg. & US Courthouse 402 East State Street Trenton, NJ 08608

> Re: Kim, Andy, et al. vs. Ocean County Clerk, et al.

> > Our File No.: 14.0059875

USDC Docket No.: 3:24-01098-ZNO-TJB

Dear Judge Quraishi:

Please be advised that we represent the Ocean County Clerk, Scott M. Colabella, in this matter. Given the common positions of the numerous County Clerk Defendants, please be advised that the Defendant, Ocean County Clerk, Scott M. Colabella, hereby joins in the briefs (ECF 44, 51, 54, 59, 60, 62 and 63) filed by the Co-Defendants in opposition to Plaintiffs' Preliminary Injunction and in support of the cross motion to dismiss Plaintiff's Motion (ECF 63). Defendant hereby adopts the arguments presented therein. The reasons set forth in the briefs of the Co-Defendants are equally applicable to Defendant, Ocean County Clerk, Scott M. Colabella; therefore, rather than duplicate efforts, we respectfully request to join in all the legal arguments advanced by the Co-Defendants in their briefs, as if the same were incorporated herein at length on behalf of Defendant, Ocean County Clerk, Scott M. Colabella. Defendant, Ocean County Clerk also respectfully reserves the right to rely upon the legal

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arguments set forth in the replies and briefs filed and/or to be filed on behalf of the Co-Defendants and any other interveners that may file oppositions to Plaintiffs' Preliminary Injunction and Motions to Dismiss Plaintiffs' request for Preliminary Injunction in this matter, to the extent that said arguments apply to this Defendant.

Thank you for your attention to this matter.

Respectfully submitted, BERRY, SAHRADNIK KOTZAS & BENSON

/s/Laura M. Benson, Esq.
LAURA M. BENSON, ESQ.

/s/Mathew B. Thompson, Esq.
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LMB/jfm

cc: All Counsel (electronic filing system)